



July 10, 2017

**IN RE: 15-91 and 15-94 – Wireless Emergency Alerts**

Despite a robust record that included comments from wireless carriers, vendors and public safety officials across the country, as well as a robust CSRIC process that advocated for these enhancements, the Commission's potential delay of the initial Notice of Proposed Rule Making ("NPRM") in 2016 has left the public safety community feeling frustrated and disappointed.

The discussion of enhancement to WEA as suggested in the Further Notice of Proposed Rule Making ("FNPRM") includes: more granular geo-targeting capabilities; solutions for alert preservation of WEA messages; multilingual availability of WEA messages; inclusion of multimedia elements in WEA messages and the capability for two-way interaction with WEA messages. These improvements to the WEA service would increase the likelihood of use by public safety and emergency management organizations in some of the largest jurisdictions in the country.

Currently, Harris County rarely uses WEA because it does not want to potentially alert the entire county when a WEA message may only pertain to a certain portion of the county. For example, an ordered evacuation for a hurricane or tropical storm would need to communicate different messages to different areas: inland populations should take shelter, while populations near the Gulf of Mexico should evacuate immediately. WEA cannot be used in Harris County for this purpose today, because it is not able to target geographic areas accurately enough to make sure that distinct emergency instructions are being received by geographically adjacent groups.

Harris County is highly confident that 0.1 of a mile would certainly be practical and feasible for most jurisdictions. However, in densely populated areas like New York City, 0.1 of a mile may be too great of an area and not specific enough. A precise measurement is important because it gives alert originators parameters to draw and arrange the polygon drawings for WEA distribution. A more precise polygon for the WEA messages would also be able to notify those coming into an area that has received a WEA message that they may be facing danger. By using the metadata and information already being collected within a mobile device, WEA could present more targeted information on what users should do in an emergency, such as evacuation routes and information based on current location.

While geo-targeting is the most pressing issue to adopting/using WEA, alert preservation would allow WEA messages to be more readily available to end users during the lifespan of the eminent threat. An app-based solution for alert preservation that comes pre-loaded on a new device, is a reasonable and desirable solution for retrieving life-saving messages distributed via WEA. Currently WEA is an opt-out system, but an app that allows users to retrieve messages based on preferences and device location would greatly enhance its utility. For example, many users choose to turn off WEA messages because of the loud noise and vibration associated with it, but the ability for opt out users to view cached alerts without experiencing the unique sound and vibration would still be beneficial to those in the affected area.

The use of an app could also address multilingual needs for emergency alerts. Some jurisdictions within Harris County maintain a language ordinance that ensures information is available in the six most common languages: English, Spanish, Vietnamese, Chinese, Arabic, and French. For the entirety of Harris County, 34% of residents speak Spanish at home while 57% of residents speak English at home. The app could also be used to reach residents that face a hearing disability. The vibrating and ringing that accompanies a WEA message was essential to notifying communities that are deaf, or hard of hearing. Storing a WEA message is only useful if the information is accessible to the user once they're notified.

Incorporating multimedia into WEA messages could provide links to additional resources, maps and other valuable information that would increase the usefulness of a WEA message. When the New York City Office of Emergency Management sent out an alert about the Chelsea Bomber, they had a photograph of the bomber that could not be included with the message due to WEA restrictions. Multimedia would be useful in manmade incidents like the bombing scenario, but also in natural disasters where evacuation maps for geo-targeted areas could be sent directly to the user. As mentioned earlier, ASL users could benefit from video support, which would also allow for multiple languages to go out in a single message. For example, the WEA message might include ASL as the video, Spanish as the voiceover, and English in the subtitles. There has been resistance to this on the part of carriers due to concerns about the stability of the data networks. The inclusion of multimedia is significantly mitigated by geo-targeting messages only to those who actually need them. Messages would better meet the expectations and needs of the end users. This issue directly impacts the efficacy of WEA alerts for populations with sensory disabilities. Every effort must be made to effectively communicate with the whole community and the inclusion of other media in WEA messages will open up multiple possibilities.

Through current mass notification software, Harris County does have the technological capabilities to provide two-way messaging to subscribed users. The ability to provide real time feedback and tracking of messages sent would provide invaluable data to emergency management and public safety officials in times of disaster. For example, being able to poll users about their current health status during a pandemic would allow responders to collect data without exposing themselves to health risks. Coupled with enhanced geo-targeting features, two-way messages could, for example, help locate people trapped in buildings in an evacuation.

The proposed changes to WEA are backed by social science research, which shows a clear need and responsibility on the part of the Commission and public safety officials to take action.

I thank you for your time and attention on these important issues.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Francisco Sánchez, Jr.', with a stylized flourish at the end.

Francisco Sánchez, Jr.

Liaison to the Director and Public Information Officer